



Revised 03/06 WDNY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

FORM TO BE USED IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983
(Prisoner Complaint Form)

17 CV 64425

All material filed in this Court is now available via the **INTERNET**. See **Pro Se Privacy Notice** for further information.

1. CAPTION OF ACTION

A. Full Name And Prisoner Number of Plaintiff: **NOTE:** If more than one plaintiff files this action and seeks in forma pauperis status, *each* plaintiff must submit an in forma pauperis application and a signed Authorization or the only plaintiff to be considered will be the plaintiff who filed an application and Authorization.

1. Samuel J Sacli Inmate # 35819

2. _____

-VS-

B. Full Name(s) of Defendant(s) **NOTE:** Pursuant to Fed.R.Civ.P. 10(a), the names of all parties must appear in the caption. The court may not consider a claim against anyone not identified in this section as a defendant. If you have more than six defendants, you may continue this section on another sheet of paper if you indicate below that you have done so.

1. WIVB-TV

4. Perry A. Sook

2. WNLO-TV

5. Unknown WIVB-TV Employees/Reporters

3. Nexstar Media Group

6. The Village of Fredonia, NY

Please see attached sheets for additional Defendants

2. STATEMENT OF JURISDICTION

This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over the action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4), and 2201.

3. PARTIES TO THIS ACTION

PLAINTIFF'S INFORMATION **NOTE:** To list additional plaintiffs, use this format on another sheet of paper.

Name and Prisoner Number of Plaintiff: Samuel J Sacli #35819

Present Place of Confinement & Address: Chautauqua County Jail, P.O. Box 190, Mayville, NY 14757.

Name and Prisoner Number of Plaintiff: _____

Present Place of Confinement & Address: _____

DEFENDANT'S INFORMATION NOTE: To provide information about more defendants than there is room for here, use this format on another sheet of paper.

Name of Defendant: WIVB-TV

(If applicable) Official Position of Defendant: CBS-affiliated television station owned and operated by Nexstar Media Group

(If applicable) Defendant is Sued in X Individual and/or X Official Capacity

Address of Defendant: 2077 Elmwood Ave. Buffalo, NY 14207

Name of Defendant: WNLO-TV

(If applicable) Official Position of Defendant: Sister station of WIVB, owned and operated by Nexstar Media Group

(If applicable) Defendant is Sued in X Individual and/or X Official Capacity

Address of Defendant: 2077 Elmwood Ave. Buffalo, NY 14207

Name of Defendant: Nexstar Media Group

(If applicable) Official Position of Defendant: Owner/operator of WIVB-TV and WNLO-TV in Buffalo, NY

(If applicable) Defendant is Sued in X Individual and/or X Official Capacity

Address of Defendant: 545 East John Carpenter Freeway, Suite 700, Irving, Texas 7506

4. PREVIOUS LAWSUITS IN STATE AND FEDERAL COURT

A. Have you begun any other lawsuits in state or federal court dealing with the same facts involved in this action?
Yes X No

If Yes, complete the next section. NOTE: If you have brought more than one lawsuit dealing with the same facts as this action, use this format to describe the other action(s) on another sheet of paper.

1. Name(s) of the parties to this other lawsuit:

Plaintiff(s): Samuel J. Saeli

Defendant(s): Brad Meyers et al

2. Court (if federal court, name the district; if state court, name the county): U.S District Court, Western District of New York

3. Docket or Index Number: 17-cv-06222

4. Name of Judge to whom case was assigned: The Honorable Siragusa

5. The approximate date the action was filed: April 11th, 2017

6. What was the disposition of the case?

Is it still pending? Yes ☒ No ☐

If not, give the approximate date it was resolved. _____

Disposition (check the statements which apply):

☐ Dismissed (check the box which indicates why it was dismissed):

☐ By court *sua sponte* as frivolous, malicious or for failing to state a claim upon which relief can be granted;

☐ By court for failure to exhaust administrative remedies;

☐ By court for failure to prosecute, pay filing fee or otherwise respond to a court order;

☐ By court due to your voluntary withdrawal of claim;

☐ Judgment upon motion or after trial entered for

☐ plaintiff

☐ defendant.

B. Have you begun **any other lawsuits** in **federal court** which **relate to your imprisonment**?

Yes ☒ No ☐

If Yes, complete the next section. NOTE: *If you have brought more than one other lawsuit dealing with your imprisonment, use this same format to describe the other action(s) on another sheet of paper.*

1. Name(s) of the parties to this other lawsuit:

Plaintiff(s): Samuel J Saali

Defendant(s): Hazleton et al

2. District Court: U.S District Court, Western District of New York

3. Docket Number: 17-cv-06223

4. Name of District or Magistrate Judge to whom case was assigned: The Honorable Siragusa

5. The approximate date the action was filed: 4/11/17

6. What was the disposition of the case?

Is it still pending? Yes ☒ No ☐

If not, give the approximate date it was resolved. _____

B. Full Name(s) of Defendants Continued:

7. The Village of Fredonia, NY Police Department

8. Chautauqua County, NY

9. Chautauqua County District Attorney Office

10. Brad Meyers

11. Patrick Swanson

12. Andrew Molitor

13. Unknown owner/CEO of WIUB-TV & WNLO-TV

Defendants Information:

Name of Defendant: Perry A. Sook

(If applicable) Official Position of Defendant: CEO of Nexstar Media Group and owner of WIUB and WNLO.

(If applicable) Defendant is sued in X Individual and/or X official Capacity.Address of Defendant: 545 East John Carpenter Freeway, Suite 700
Irving, Texas 75062

Name of Defendant: Unknown WIUB Employees/Reporters

(If applicable) Official Position of Defendant: Employees of WIUB and Nexstar Media group

(If applicable) Defendant is sued in X Individual and/or X official Capacity

Address of Defendant: 545 East John Carpenter Freeway, Suite 700 Irving Tx 75062 or 2077 Elmwood Ave. Buffalo, NY 14207

Defendants Information Continued:

Name of Defendant: Chautauqua County District Attorneys Office
(If applicable) official Position of Defendant: Legal entity within
Chautauqua County, NY

(If applicable) Defendant is sued in X Individual and/or
official Capacity

Address of Defendant: 1 North Erie Street; Mayville, NY 14757.

Name of Defendant: Patrick Swanson

(If applicable) Official Position of Defendant: Chautauqua County
District Attorney

(If applicable) Defendant is sued in X Individual and/or
Official Capacity

Address of Defendant: 1 North Erie Street; Mayville, NY 14757

Name of Defendant: Andrew Molitar

(If applicable) Official Position of Defendant: Assistant District
Attorney in Chautauqua County

(If applicable) Defendant is sued in X Individual and/or
official Capacity

Address of Defendant: 1 North Erie Street; Mayville, NY 14757

Name of Defendant: Unknown owner/CEO of WIUB-TV & WNLO-TV

(If applicable) official Position of Defendant: Owner/CEO of WIUB-TV and WNLO-TV

(If applicable) Defendant is sued in X Individual and/or X official Capacity

Address of Defendant: 2077 Elmwood Ave. Buffalo, NY 14207

Defendants Information Continued:

Name of Defendant: The Village of Fredonia, NY
(If applicable) Defendant is sued in X Individual and/or X
Official Capacity
(If applicable) Official Position of Defendant: Employer of Brad
Meyers
Address of Defendant: 9 Church St., Fredonia, NY 14063

Name of Defendant: The Village of Fredonia, NY Police Department
(If applicable) Official Position of Defendant: Law Enforcement Agency
of the Village of Fredonia, NY
(If applicable) Defendant is sued in X Individual and/or X
Official Capacity
Address of Defendant: 9 Church St., Fredonia, NY 14063

Name of Defendant: Brad Meyers
(If applicable) Official Position of Defendant: Chief of Police of the
Village of Fredonia, NY
(If applicable) Defendant is sued in X Individual and/or X
Official Capacity
Address of Defendant: 9 Church St., Fredonia, NY 14063

Name of Defendant: Chautauqua County, NY
(If applicable) Official Position of Defendant: Employer of Patrick
Swanson and Andrew Molitar
(If applicable) Defendant is sued in X Individual and/or Official Capacity
Address of Defendant: 1 North Erie Street; Mayville, NY 14757

4. Previous Lawsuits in state and Federal Court

B. Have you begun any other lawsuits in federal court which relate to your imprisonment? Yes X No

1. Name(s) of the parties to this lawsuit:

Plaintiff(s): Samuel J Saeki

Defendant(s): Diagastino et al

2. Court (if federal court, name the district; if state court, name the county): US District Court, Western District of New York

3. Docket or Index Number: 17-cv-06219

4. Name of Judge to whom case was assigned: The Honorable Siragusa

5. The approximate date the action was filed: 4/11/2017

6. What was the disposition of the case?

Is it still pending? Yes X No

4. Previous Lawsuits in State and Federal Court

A. Have you begun any other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes X No

1. Name(s) of the parties to this other lawsuit:

Plaintiff(s): Samuel J Saeli

Defendant(s): Chautauqua County et al

2. Court (if federal court, name the district; if state court, name the county): US District Court, Western District of New York

3. Docket or Index Number: 17-cv-06221

4. Name of Judge to whom case was assigned: The Honorable Siragusa

5. The approximate date the action was filed: 4/11/17

6. What was the disposition of the case?

Is it still pending? Yes X No

A. First Claim: On (date of the incident) On or about August 16th 2016 - Present

Defendant (give the name and position held of each defendant in this incident): WIVB-TV, television station in Buffalo, NY; WNLO-TV, television station in Buffalo, NY; Nexstar Media group, owner and operator of WIVB TV and WNLO-TV; Perry Sook, CEO of Nexstar Media group; The Village of Fredonia, NY, Employer of Brad Meyers; Brad Meyers, Village of Fredonia NY, Chief of Police; Village of Fredonia, NY Police Department, Law enforcement agency in Fredonia, NY; Chautauqua County, NY, employer of Patrick Swanson and Andrew Molitar; Chautauqua County District Attorneys Office; Patrick Swanson, then acting District attorney, now district attorney in Chautauqua County, NY; Andrew Molitar, assistant district attorney of Chautauqua County, NY.

did the following to me (briefly state what each defendant named above did: WIVB, WNLO and Nexstar Media group, under the control and authority of CEO Perry Sook did disseminate, report on its news broadcast and publish and share on its website and social media sites, with a reach and audience extending beyond the Buffalo, NY market and into other states and countries, false, defamatory libelous, slanderous, inaccurate, incomplete, unproven and unsubstantiated information regarding the false arrest of Plaintiff and received from the Village of Fredonia, NY; The Village of Fredonia NY Police Department; Brad Meyers, Chautauqua County, NY; The Chautauqua County District Attorney's Office; Chautauqua District Attorney Patrick Swanson and assistant district attorney Andrew Molitar such information via press release. This press release was sent to WIVB-TV; WNLO-TV and

Saeki v. WIVB

Nexstar Media Group and certain staff/reporters on WIVB-TV and acted in a capacity and under the direction and authority and consent of its owners and CEO and was reported as factual with little to no inquiry or questioning of such "facts" and "information" with no attempt to reach out to or contact Plaintiff concerning such allegations. The false, misleading, slanderous, libelous, and defamatory content and information about Plaintiff is still available to any person, group, employee, etc to view and share with other people (not only in Western, NY but in other states, and countries via WIVB's website and social media) with no disclaimer or disclosure relating to the appropriate use of language and conduct of its users and visitors commenting on their news stories, articles and posts and no disclosure or disclaimer that such information should not be used to threaten, harass, annoy, or alarm Plaintiff and that anyone accused of a crime, specifically the Plaintiff, does have rights, specifically a right to a trial and that anyone, specifically the Plaintiff is innocent until proven guilty in a court of law. As such, there were also no regulations, standards, oversight and management of comments on the sites operated and controlled by Defendants on the story related to Plaintiff that were placed on WIVB's social media accounts and website which were directed at Plaintiff and were threatening, alarming, annoying, and harassing and placed Plaintiff in fear of his life, safety and well being and causing Plaintiff to suffer undue fear, stress, emotional distress and anxiety and depression.

A. Second Claim: Upon Plaintiff receiving information regarding the false, inaccurate, misleading, incomplete, unsubstantiated, libelous, slanderous, defamatory, and unproven information that WIVB, WNLO, Nexstar Media Group and CEO Perry Sook did report, publish, and disseminate such false, misleading,

Saeli v. WIUB

A. Second Claim Continued:

in complete, unsubstantiated and unproven information, Plaintiff did write the station manager at WIUB-TV at 2077 Elmwood Ave, in Buffalo, NY, that the complete story, including my side of the event be told and I requested an interview with WIUB-TV, not only to allow for the telling of my side of the event (information which they deliberately and conveniently left out of their stories and postings about Plaintiff, but also to correct such false, inaccurate, misleading, slanderous, libelous, defamatory, incomplete, unsubstantiated and unproven information reported and posted in a negligent, unprofessional and incompetent manner by Defendants and disseminated by Defendants via Defendants website and social media. Plaintiff's letter and request was ignored by Defendants.

A. Third Claim Continued.

Defendants did create a social media account(s) and do operate and control their social media sites and websites. Through defendants social media and website, Defendants do report, publish, post and disseminate articles and information they deem newsworthy which are read, downloaded and shared by other users both locally and across state lines, but also internationally as well. The content of Defendants website and social media can be shared and/or ~~reposted~~ reposted by users and/or visitors to their sites. Users and visitors can also post their own comments on Defendants website and social media. The formats of such sites and comments posted by users and visitors is operated and controlled by WIUB and Nexstar Media Group with no rules, standards or disclosures regulating the conduct or language of the users/visitors visiting Defendants sites, thus there were no restrictions of what users/visitors could say regarding their comments on articles related

A. Third Claim Continued

to Plaintiff. Defendants oversaw and posted, published and distributed such articles that were false, inaccurate, defamatory, slanderous, libelous and misleading and allowed such users/visitors to post comments on their website and social media sites that were false, vulgar, threatening, harassing, alarming, derogatory and annoying towards Plaintiff and placed Plaintiff in fear of his life safety and well being and did cause Plaintiff to suffer undue stress, emotional distress and anxiety, and depression

The constitutional basis for this claim under 42 U.S.C subsection 1983 is: Including, but not limited to Eighth and Fourteenth U.S constitutional rights, civil rights violations and F.C.C violations

The relief I am seeking for this claim is (briefly state the relief sought): I am seeking \$20 million dollars in damages from Defendants due to their deliberate indifference to my life, safety and well being and indifference to my federal, civil and constitutional rights and the fact that Defendants nurtured and promoted a hostile environment towards Plaintiff.

Exhaustion of Your Administrative Remedies for this Claim:

Did you grieve or appeal this claim? — Yes ☒ No ☐ IF yes, what was the result?

Did you appeal that decision? — Yes ☒ No ☐ IF yes, what was the result?

If you did not exhaust your administrative remedies, state why you did not so: This is not a grievable issue but involves entities and people relevant to violations of rights incurred by Plaintiff from Defendants

A. FIRST CLAIM: On (date of the incident) On or about August 16th 2016 - Present,
 defendant (give the **name and position held** of **each defendant** involved in this incident) WIVB-TV, a television news station in Buffalo, NY; WNLO-TV, the sister news station of WIVB-TV; Nexstar Media Group; owner and operator of WIVB-TV; Perry Sook, CEO of Nexstar Media Group; The Village of Fredonia, NY; The Village of Fredonia, NY Police Department; Brad Meyers, Chief of Police; Chautauque County, NY; Chautauque County District Attorney did the following to me (briefly state what each defendant named above did): WIVB-TV; WNLO-TV and Nexstar Office Media Group, under the control and authority of CEO Perry Sook did disseminate, report on its news broadcasts and publish and share on its website and social media sites, with a reach and audience extending beyond the Buffalo, NY market and into other counties, states, and countries false, defamatory, libelous, slanderous, inaccurate, incomplete, unproven and unsubstantiated information regarding the false arrest of Plaintiff and received from the Village of Fredonia, NY; The Village of Fredonia, NY Police Department; Brad Meyers; Chautauque County, NY; The Chautauque County District Attorney's Office
 The constitutional basis for this claim under 42 U.S.C. § 1983 is: Including, but not limited to: Eighth and Fourteenth U.S constitutional rights, civil rights violations and F.C.C violations
 The relief I am seeking for this claim is (briefly state the relief sought): Due to the deliberate indifference to the constitutional and civil rights of Plaintiff and due to the fear, emotional distress and anxiety and Defendants nurtured and created an environment where threats, lies, harassment and other such comments were made directed towards Plaintiff, Plaintiff is seeking \$15 million dollars in damages.

Exhaustion of Your Administrative Remedies for this Claim:

Did you grieve or appeal this claim? Yes ☒ No If yes, what was the result? This is not a grievable Jail issue, but involves entities and people relevant to violations incurred by Plaintiff
 Did you appeal that decision? Yes ☒ No If yes, what was the result? This is not a grievable Jail issue, but involves entities and people relevant to violations incurred by Plaintiff

Attach copies of any documents that indicate that you have exhausted this claim.

If you did not exhaust your administrative remedies, state why you did not do so: This is not a grievable issue, but involves entities and people relevant to violations incurred by Plaintiff; but Defendants did operate with and in conjunction with the Village of Fredonia, NY; The Village of Fredonia Police Department; Brad Meyers; Chautauque County, NY; Patrick Swanson and Andrew Molinar.

A. SECOND CLAIM: On (date of the incident) On or about September 24th 2016,
 defendant (give the **name and position held** of **each defendant** involved in this incident) WIVB-TV; WNLO-TV; Nexstar Media Group; Perry Sook, CEO; WIVB-TV and WNLO-TV Station Managers; Unknown employees/reporters of WIVB-TV

did the following to me (briefly state what each defendant named above did): Upon receiving information regarding the false, inaccurate, misleading, incomplete, unsubstantiated, libelous Slanderaus, defamatory and unproven information that WIUB, WNLO, Nexstar Media group and CEO Perry Seck did report, publish and disseminate such false, misleading, incomplete, unsubstantiated and unproven information, Plaintiff did write the station manager at WIUB-TV at 2077 Elmwood Ave, in Buffalo, NY that the complete story, including my side of the event be told and I requested an interview with WIUB-TV not only to allow for the telling of my side of the event, information which they deliberate and conveniently left out of their stories and postings (Please see attached sheet for more information)
 The constitutional basis for this claim under 42 U.S.C. § 1983 is: Including, but not limited to Eighth and Fourteenth U.S. Constitutional rights; civil rights violations and FCC Violations.

The relief I am seeking for this claim is (briefly state the relief sought): I am seeking \$5 million dollars in damages due to their deliberate indifference to my life, safety and well being and indifference to my federal, civil and constitutional rights

Exhaustion of Your Administrative Remedies for this Claim:

Did you grieve or appeal this claim? _____ Yes ☒ No _____ If yes, what was the result? _____

Did you appeal that decision? _____ Yes ☒ No _____ If yes, what was the result? _____

Attach copies of any documents that indicate that you have exhausted this claim.

If you did not exhaust your administrative remedies, state why you did not do so: This is not a grievable issue but involves entities and people relevant to violations of rights incurred by Plaintiffs from Defendants

If you have additional claims, use the above format and set them out on additional sheets of paper.

6. RELIEF SOUGHT

Summarize the relief requested by you in each statement of claim above.

I am seeking in total \$40 million dollars in compensatory, nominal and punitive damages due to the hostile environment Defendants nurtured and promoted against me; there deliberate indifference to the life safety and well being of Plaintiff and their disregard to the civil, state and Constitutional rights as evidenced in the false information broadcast, published and posted on Defendants Website and social media sites. I am also seeking declaratory and injunctive relief against Ben Meyer, Patrick Swar

and Andrew Holst

Do you want a jury trial? Yes ☒ No _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/17/17
(date)

NOTE: *Each plaintiff must sign this complaint and must also sign all subsequent papers filed with the Court.*

Samuel J. Sad

Signature(s) of Plaintiff(s)



Inmate Activity Log

Saeli, Samuel J



Print Date/Time: 06/14/2017 10:07
Login ID: ccsolsd579
Booking: 2016-00001738

From Date: 08/17/2016 00:00
To Date: 12/31/2016 23:59

ORI Number:

Date/Time	Category	Activity Type	Sub Type	Officer	Score	Results Entered By	Status
09/30/2016 02:36	Contact	Contact	mail	5074 - Veres			
	Narrative: Damans Vargas - Media Type: Letter - InOut: In - Quantity: 1						
10/02/2016 03:19	Contact	Contact	mail	5107 - Pulci			
	Narrative: damaris vargas - 49 w 6th st dunkirk ny 14048 Media Type: Letter - InOut: In - Quantity: 1						
10/03/2016 00:08	Contact	Contact	mail	5107 - Pulci			
	Narrative: American civil liberties - po box 475 niagara square station buffalo ny 14201 Media Type: Letter - InOut: Out - Quantity: 1						
10/03/2016 00:08	Contact	Contact	mail	5107 - Pulci			
	Narrative: legal action center - 153 waverly place new york ny 10014 Media Type: Letter - InOut: Out - Quantity: 1						
10/03/2016 00:08	Contact	Contact	mail	5107 - Pulci			
	Narrative: WIVB news channel - 2077 elmwood ave buffalo ny 14207 Media Type: Letter - InOut: Out - Quantity: 1						
10/03/2016 15:40	Contact	Contact	mail	5046 - DiDomenico			
	Narrative: PACKAGE PREMIER BOOKS - (2) SOFT COVERED BOOKSALEMS LOT & HE CAME TO SET CAPTIVES FREE. PLACED IN PROPERTY . OVER LIMIT. Media Type: Package - InOut: In - Quantity: 1						
10/04/2016 01:45	Contact	Contact	mail	5062 - Abel			
	Narrative: Devonte Chandler - CCJ Media Type: Letter - InOut: Out - Quantity: 1						
10/06/2016 02:04	Contact	Contact	mail	5074 - Veres			
	Narrative: Damans Vargas - x2 Media Type: Letter - InOut: In - Quantity: 1						
10/06/2016 02:05	Contact	Contact	mail	5074 - Veres			
	Narrative: Roseanne & Stanley Saeli - Media Type: Letter - InOut: In - Quantity: 1						
10/06/2016 23:18	Contact	Contact	mail	5034 - Bryant			
	Narrative: damaris vargas - Media Type: Letter - InOut: Out - Quantity: 1						
10/06/2016 23:18	Contact	Contact	mail	5034 - Bryant			
	Narrative: national employment law - national employment law project inc. Media Type: Letter - InOut: Out - Quantity: 1						
10/06/2016 23:20	Contact	Contact	mail	5034 - Bryant			
	Narrative: devonte chandler - CCJ Media Type: Letter - InOut: Out - Quantity: 1						
10/06/2016 23:20	Contact	Contact	mail	5034 - Bryant			

United States District Court
For the Western District of New York
68 Court St.
Buffalo, NY 14202

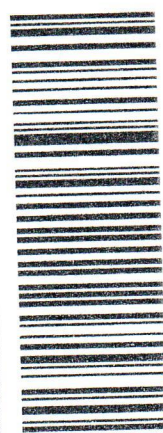
To the Western District Court of New York:

Enclosed, please find for your review and filing seven (7) lawsuits for filing. I had previously filed lawsuits with this Court under index numbers 17-CV-6219; 17-CV-6220; 17-CV-6221; 17-CV-6222. I don't have access to any legal resources or an adequate law library, but this paper work includes seven (7) 42 U.S.C subsection 1983 complaint forms; seven (7) civil cover sheets; seven (7) In Forma Pauperis; seven (7) Inmate Authorizations and seven (7) Requests for the appointment of Counsel. Additionally, with the City of Lackawanna, I have included the New York State Division of Criminal Justice Services, the Cycle 9 of an arrest that occurred in 2012 and settled in 2012 [I've also included the Certificate of Conviction/Disposition] but the matter was unresolved and left open on the Report from the New York State Division of Criminal Justice Services as the City Court of Lackawanna never reported the final disposition to New York State. I've also included ~~agreed~~ with my complaints against WKBW, WVRZ, and WFUV my jail house mail log showing when I wrote to those stations requesting that the truth, including my side of the event be told. All three stations ignored my letter and never replied, allowing the story to be told biasly and falsely.

I am still incarcerated at the Chautauque County jail, so please continue to send any future correspondence to the address below.

Sincerely,
Samuel J. Saeli

Samuel J Saeli; P.O. Box 196 Inmate # 35819
Mayville, NY 14757



7015 3430 0000 2064 9707

525

Samuel J Saeth
P.O Box 190
Mayville, NY 14757



United States District Court
For the Western District of New York
68 Court St.
Buffalo, NY 14202



Label 107R, July 2013

JS 44 (Rev. 08/16)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS Samuel J Saeli**(b)** County of Residence of First Listed Plaintiff Chautauqua
(EXCEPT IN U.S. PLAINTIFF CASES)**(c)** Attorneys (Firm Name, Address, and Telephone Number) Pro Se
P.O. Box 190
Mayville, NY 14757**DEFENDANTS** WIVB-TV; WNLO-TV; Nexstar Media
Group; Perry A. Sook; Unknown WIVB-TV Employees/Reporters
The Village of Fredonia, NY; The Village of Fredonia, NY Police
Department; Chautauqua County NY; Chautauqua County District
Attorney Office; Brad Meyers; Patrick Swanson; Andrew Moditar
County of Residence of First Listed Defendant Erie County
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input checked="" type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input checked="" type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. Subsection 1983Brief description of cause: Nurturing and promoting a hostile environment towards Plaintiff; Receiving, reporting and disseminating false, inaccurate, slanderous, libelous and untrue defamatory information about Plaintiff**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$ 40 million Dollars

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____